

**DECLARATION OF SALLYANN JENNINGS
PURSUANT TO 28 U.S.C. § 1746**

I, Sallyann Jennings, hereby depose as swear as follows:

1. My name is Sallyann Jennings. I began my career as a counselor working with children and I later expanded my practice to counsel adolescents and adults. Travis James Mullis was one of my clients in the early 1990's

2. I began working with Travis when he was four years old. I immediately noted that his parents, Anne and Gary, had issues. For instance, Anne introduced Travis as her adopted son. Presenting him that way stressed the importance of his 'otherness' in the family unit. Anne was very critical of Travis and everything he did. ~~She treated him like the adopted child.~~ On the other hand, she had nieces and a nephew that were biologically related to her. They ~~were~~ ^{Seemed} more important to her. She saw Travis as someone who was just giving her grief.

3. At the time I was seeing him, the issues Travis had were not major issues. Travis was a likeable kid. Travis' father was the more affectionate of his parents. I would describe Travis' mother as a prickly cactus. She was not every expressive with her feelings and seemed more concerned with the problems Travis caused her rather than the pain he was feeling. Overall, Anne was pessimistic, she failed to acknowledge Travis' improvement and was very critical of him at every turn. I typically had parent conferences ~~every four months~~. From meeting with them in the conferences and seeing them when they dropped Travis off or picked him up, I knew one of the major issues in the situation was that Anne needed help parenting. Her need multiplied once Gary was out of the picture.

4. When Travis first told me that his father had been "playing with my wee wee" or something to that effect in the bath, Anne was furious with Travis. She asked him why he would say such a

thing. She was very protective of her husband after the accusations. It wasn't until after Gary admitted to some of the abuse that she accepted it and realized she was wrong for not believing Travis.

5. After Anne and Gary separated, Anne reported that Travis was playing sexual games with his cousins. I forget what happened exactly, but it was relatively minor acting out compared to the offense he was sent to The Jefferson School for as an adolescent. Anyway, Anne was livid about it. She accused me of failing to treat him. I recall her angrily firing me after one incident. I always felt like I was on eggshells with her.

6. Basically, when something major— or even minor— happens in a child's life a child will imitate what happened in order to master it. For example, if a child sees his parents fight, he might fight with someone else in order to experience, understand, and feel a sense of control over what happened. There needs to be a period of time wherein their little psyches have an opportunity to understand what they see. Since children do not have the complex language to process problems verbally, they process by acting out what happened through play. Play therapy gives the child an opportunity to play through the traumatic event in order to overcome it, so the long term damage can be reduced. In play therapy, the hope is that a child with the kind of trauma Travis experienced may be less likely to act out in the extreme way he ultimately did.

7. Anne didn't seem to hear anything I said to her about Travis' treatment. I tried to explain to Anne what was happening when Travis acted out sexually but she did not seem to understand. She went through the motions of trying to get him some help, but she wasn't engaging in the process. When Anne discontinued treatment with me for Travis, it was a crucial time for him to be in treatment. Travis needed to continue to have a space to process the sexual abuse. I told her that he didn't need to be in treatment with me, but he needed to be in treatment.

8. A mitigation specialist from Texas named Gina Vitale contacted me about Travis' death penalty trial. We spoke on the phone a few times and I answered her questions about Travis. I never met with anyone working on Travis' defense in person. I was cooperative with the defense team and would have been willing to meet with Gina, Travis' trial lawyers, or mental health experts working on Travis' case. Gina spoke with me about the possibility of me testifying at his trial, but I never received a subpoena. If I had been served a subpoena, I would have traveled to Texas to testify. I would have testified to all of the information above.

I hereby certify that the facts set forth above are true and correct to the best of my personal knowledge, information, and belief, subject to the penalty of perjury, pursuant to 28 U.S.C. § 4904.

7/15/13

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